

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Lawrence Brunn

Case No. 8:25-mj-2532-NHA

WDPA Case No: 2:25-mj-01229

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 28, 2025 in the county of Hillsborough in the
Middle District of Florida, the defendant(s) violated:

Code Section

18 U.S.C. § 2261A(2)

Offense Description

Cyber Harassment

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Corey Doster, Special Agent, FBI

Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me
pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: July 14, 2025

*Judge's signature*City and state: Tampa, FL

HONORABLE NATALIE HIRT ADAMS, U.S.M.J.

Printed name and title

AFFIDAVIT

I, Corey Doster, Special Agent (“SA”) of the Federal Bureau of Investigation (“FBI”), being duly sworn, do depose and state the following.

Introduction

1. I make this affidavit in support of a criminal complaint charging Lawrence Brunn (“BRUNN”), with Cyber Harassment, in violation of 18 U.S.C. § 2261A(2).

2. The information set forth in this affidavit is based upon my own personal knowledge derived from my participation in this investigation; information provided to me by other law enforcement officers; and from the review of reports of interviews, photographs, videos, and evidence recovered in this investigation. Because this affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint, I have not set forth each fact that I learned as a result of this investigation. Rather, I have set forth only those facts I believe are necessary to establish probable cause that a violation of federal law has been committed.

Agent Background

3. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2016. I am presently assigned to the Tampa Bay Safe Streets Task Force of the Tampa Division of the FBI, where I am involved in a wide variety of investigative matters, including violations of Federal law relating to criminal enterprises, gangs, violent crimes, and narcotics trafficking. During my time as a

Special Agent with the FBI, I have participated in drug, firearm, and gang investigations as the primary investigator or in a subsidiary role. I am familiar with the procedures, activities, and investigative techniques associated with gang activities, drug trafficking, and firearms offenses.

4. Based on the investigation described in this affidavit, there is probable cause to believe BRUNN with the intent to harass or intimidate another person, used the mail, any interactive computer service or electronic communication service, or any other facility of interstate or foreign commerce to engage in conduct that placed J.C. in reasonable fear of death or serious bodily injury, in violation of 18 U.S.C. § 2261A(2).

PROBABLE CAUSE

5. J.C. is currently the Chief Executive Officer at Tampa General Hospital (“TGH”). He has been employed in that role since 2017. J.C. currently lives and works in the Middle District of Florida.

6. Prior to working at TGH, J.C. was the President and Chief Executive Officer at the Jupiter Medical Center (“JMC”), between 2010 and 2017. BRUNN worked with J.C. at JMC. BRUNN’s employment at that hospital ended after he falsely accused JMC’s Chief Financial Officer of embezzling funds from JMC. J.C., in his role as President and CEO of JMC, was responsible for terminating BRUNN’s employment in 2014.

7. Following his termination, BRUNN began harassing JMC, ultimately resulting in a lawsuit being filed by JMC against BRUNN. At the conclusion of that

lawsuit in 2020 with a finding in favor of JMC, BRUNN began targeting J.C. with intimidation and threats calling for J.C.'s execution.

8. Since at least 2023, BRUNN has used his own website (www.icanfundtheusa.com), a facility of interstate or foreign commerce, to post intimidating and harassing threats targeting J.C., placing J.C. in fear for his life.

9. Over time, BRUNN's posts have increased in frequency and intensity. His posts have called for J.C.'s execution, frequently referring to his beheading utilizing a guillotine.

10. Many of the posted threats appear in the form of recorded videos, wherein BRUNN's voice can be clearly heard while BRUNN refers to various financial documents purportedly from TGH and other medical entities. J.C. has watched these videos and given his familiarity with BRUNN, knows the voice on the recordings to be that of BRUNN. Additionally, in many of the videos, BRUNN references information only BRUNN himself would be privy too.

11. On April 9, 2025, BRUNN posted on an internet website that J.C. "should have his head chopped off...we should take them out back and chop their heads off." On April 17, 2025, BRUNN posted on the same internet website that "we the people say these MFers deserve the guillotine because they embezzled \$152 million from us...you all need to have your heads taken off. You need to donate your heads, OK? It's called a guillotine, OK? You should be scared, not of me, but of we the people. OK?"

12. On May 8, 2025, BRUNN posted on an internet website that “poor little [J.C.] at this entity, he gets his head chopped off...we’re going to chop your head off as punishment...and when he’s sitting there on his knees waiting for the guillotine to come down...”

13. On May 19, 2025, BRUNN posted on an internet website that “I hope you guys at TGH really appreciate me taking you all down...You guys need to bend over and the person pulls your lottery ticket gets to trip the guillotine. One bucket for heads, a bigger bucket for bodies. And then they get to keep your house and all of your assets free of charge. All they have to do is be the executioner...so little [J.C], you can be a slave in the house that you used to live in...I hope you guys really appreciate this, when your heads are rolling into those buckets. You deserve this.”

14. On June 4, 2025, BRUNN posted on an internet website, “I say we put up the guillotine behind the courthouse and we chop your freaking head off, one bucket for heads, one bucket for bigger bucket for bodies...we’re going to give you exactly what you’ve given us, which is complete misery and suffering.”

15. On June 28, 2025, BRUNN posted on an internet website, “we should be able to allow them to chop your heads off. And then I ought to say to you, OK, you know what? Take off all your clothes and put on this red cape. And then we’re going to put a blindfold on you. And we’re going to show you something in the back. Kneel down on your knees for second. Bend over. And then which one of you historically oppressed minorities wants to pull the lever? And remember, if you pull

the lever on, whoever you pull the lever on, you chop their head off, one bucket for heads, a bigger bucket for bodies.”

16. In addition to internet postings, BRUNN has also sent mailings to J.C.’s private residence, as well J.C.’s neighbors’ residences, and members of the Board of Trustees of TGH.

17. J.C. is in fear for his life, as well as the lives of his family members. As a result of BRUNN’s threats, J.C. has employed full-time security to monitor his residence and transport J.C. to and from work. J.C. no longer feels safe going out in public with his family without security.

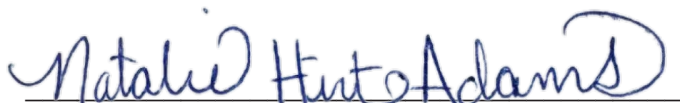
CONCLUSION

18. Based on the foregoing facts and opinions, my experience and training, and consultation with other law enforcement agents, I believe that there is probable cause to believe that BRUNN has committed crimes, in violation of 18 U.S.C. § 2261A(2).



SA Corey Doster
Federal Bureau of Investigation

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) before me this 14th day of July, 2025



HONORABLE NATALIE HIRT ADAMS
United States Magistrate Judge

UNITED STATES DISTRICT COURT

for the

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v.

Lawrence Brunn

Case No. 8:25-mj-2532-NHA

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) Lawrence Brunn,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Cyber Harassment, in violation of 18 U.S.C. § 2261A(2).

Date: July 14, 2025


Issuing officer's signature

City and state: Tampa, FLHONORABLE NATALIE HIRT ADAMS, U.S.M.J.*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: Lawrence Brunn

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: FBI

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25-mj-2532-NHA
USAO NO. 2025R01278

LAWRENCE BRUNN

**MOTION TO SEAL COMPLAINT
AND RELATED DOCUMENTS**

Pursuant to Fed. R. Crim. P. 6(e)(4), and in the interests of law enforcement, the United States of America by Gregory W. Kehoe, United States Attorney for the Middle District of Florida, hereby moves the Court to direct the Clerk to seal the Complaint, the file copy of the warrant(s), defendant information sheet(s), this motion, the Court's order regarding this motion and any other documents filed in this case that would identify the defendant(s). Disclosure of the existence of these documents prior to the arrest of a defendant could hinder or impede arrest efforts.

The United States further moves that the Court direct the Clerk to seal the Complaint in this case except when necessary to provide certified copies of the Complaint to the United States Attorney's Office.

The United States further requests that the Court's Order allow the United States Marshals Service to release certified copies of the arrest warrant to the case agent or other appropriate law enforcement and/or to the United States Attorney's Office, upon verbal request of the United States Attorney's Office to the United States Marshals Service, without further order of the Court.

The United States further requests that the Court's Order allow the United States Marshals Service or other appropriate law enforcement agency to enter the arrest warrant into the National Crime Information Center (NCIC) database or other appropriate law enforcement database, without further order of the Court.

The United States further requests that the Court's Order allow the United States to disclose the existence of the Complaint in any subsequent search and/or seizure warrants which may be executed in conjunction with the arrest of the defendant(s).

The United States further moves that the Court direct the Clerk to unseal the documents described herein without further order when any named defendant is taken into custody.

Respectfully submitted,

GREGORY W. KEHOE
United States Attorney

By: /s/ Candace Garcia Rich
Candace Garcia Rich
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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25-mj-2532-NHA
USAO NO. 2025R01278

LAWRENCE BRUNN

ORDER

The Motion to Seal Complaint and Related Documents filed by the United States is hereby GRANTED, and the Clerk of Court is so directed.

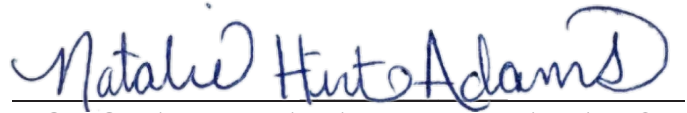
The Clerk is further directed to seal the Complaint in this cause except when necessary to provide certified copies of the Complaint to the United States Attorney's Office;

It is further ordered that upon verbal request from the United States Attorney's Office that the United States Marshals Service is to release a certified copy of the arrest warrant to the case agent or other appropriate law enforcement and/or to the United States Attorney's Office without further order of the Court. It is further ordered that the United States Marshals Service or other appropriate law enforcement agency may enter the arrest warrant into the National Crime Information Center (NCIC) database or other appropriate law enforcement database without further order of the Court.

It is further ordered that the United States may disclose the existence of the Complaint in any search and seizure warrants to be executed in conjunction with the arrest of the defendant(s).

The Clerk is further ordered to unseal all documents relating to the Complaint without any further Order of the Court when any named defendant is taken into custody.

DONE AND ORDERED at Tampa, Florida, this 14th day of July, 2025.



HONORABLE NATALIE HIRT ADAMS
United States Magistrate Judge